

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIANE DENMARK,

Plaintiff

v.

LIBERTY LIFE ASSURANCE COMPANY OF  
BOSTON, THE GENRAD, INC. LONG TERM  
DISABILITY PLAN, THROUGH  
TERADYNE, INC., AS SUCCESSOR  
FIDUCIARY

Defendants

Civil Action No. 04-12261-DPW

**DECLARATION OF PAULA MCGEE**

I, Paula McGee, do hereby under oath depose and say as follows:

1. I am over the age of eighteen and am a resident of the State of Florida. I am fully competent to testify as to the matters set forth in this declaration, which are true and correct based upon my own personal knowledge, unless indicated to the contrary.

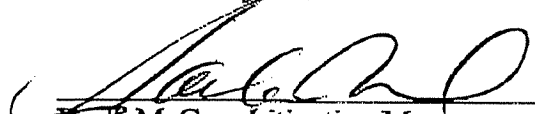
2. I am currently employed as the Litigation Manager for Liberty Life Assurance Company of Boston ("Liberty Life") and have been since 1999. Liberty Life issued a long-term group disability policy to the employer of Plaintiff in this matter, Genrad, Inc., to provide benefits to its employees pursuant to Genrad's long-term disability plan, which is a welfare benefit plan governed by the Employee Retirement Income Security Act of 1974, as amended (hereinafter "ERISA").

3. As part of my duties as Litigation Manager, I am responsible for maintaining records of claims and administrative appeals of beneficiaries under Liberty Life's policies.

4. In addition, as part of my duties as Litigation Manager, I am familiar with the documents governing the administration of policies issued by Liberty Life and maintain copies of the policy documents in my control.

5. I certify that the document entitled the "Administrative Record of Diane Denmark Submitted by Defendant for Judicial Review," which I am informed was filed with the Court on January 20, 2005, included an authentic copy of the policy governing Plaintiff's claim at Tab A, and a copy of the Administrative Record regarding Plaintiff's claim and appeal at Tab B.

Signed under the pains and penalties of perjury this 28<sup>th</sup> day of May, 2005.

  
Paula McGee, Litigation Manager